



## Notice of Service of Process

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Transmittal Number: 24737733  
Date Processed: 04/08/2022

**Primary Contact:** Heather McClow  
Lowe's Companies, Inc.  
1000 Lowes Blvd  
Mooresville, NC 28117-8520

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<b>Entity:</b>	Lowe's Home Centers, LLC Entity ID Number 2515365
<b>Entity Served:</b>	Lowe's Home Centers, LLC
<b>Title of Action:</b>	Paula Woody vs. Lowe's Home Centers, LLC -- Store #1704
<b>Matter Name/ID:</b>	Paula Woody vs. Lowe's Home Centers, LLC -- Store #1704 (12175198)
<b>Document(s) Type:</b>	Summons/Complaint
<b>Nature of Action:</b>	Personal Injury
<b>Court/Agency:</b>	Obion County Circuit Court, TN
<b>Case/Reference No:</b>	CC-22-CV-24
<b>Jurisdiction Served:</b>	Tennessee
<b>Date Served on CSC:</b>	04/07/2022
<b>Answer or Appearance Due:</b>	30 Days
<b>Originally Served On:</b>	CSC
<b>How Served:</b>	Personal Service
<b>Sender Information:</b>	Boren & Boyd, PLC 731-423-3300

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Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

**To avoid potential delay, please do not send your response to CSC**

251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | [sop@cscglobal.com](mailto:sop@cscglobal.com)

DEFENDANT'S COPY

**STATE OF TENNESSEE**

Circuit Court of Obion County

PAULA WOODY,

Plaintiff,

vs.

LOWE'S HOME CENTERS, LLC --  
STORE #1704

Defendant.

Civil Action No.: CC-22-CV-24

SUMMONS:

TO BE SERVED ON:

Corporation Service Company

2908 Poston Avenue

Nashville, Tennessee 37203

as registered agent for service of  
process for Lowe's Home Centers, LLC  
Store #1704**To the above-named Defendant(s):**

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and serving a copy of your answer to the complaint upon Jeffrey P. Boyd, Plaintiff's attorney, whose address is Boren and Boyd, PLC, 114 South Liberty Street, Jackson, Tennessee 38301, within thirty (30) days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

Witness, Harry Johnson, Clerk of said Court, at office on  
the 31 in March A.D., 2022.

Harry Johnson  
Clerk  
By: Denise Taylor  
Deputy Clerk

**To the Defendant(s)**

Tennessee law provides a ten thousand dollar (\$10,000.00) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary, however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. (T.C.A. § 26-2-114)

**RETURN OF SERVICE ON SUMMONS**

I hereby certify and return, that on the \_\_\_\_\_ day of \_\_\_\_\_, 2022, I served this summons together with a copy of the complaint herein as follows: \_\_\_\_\_



Name of Server \_\_\_\_\_  
Title: \_\_\_\_\_

IN THE CIRCUIT COURT OF OBION COUNTY, TENNESSEE  
AT UNION CITY

OBION COUNTY  
CIRCUIT COURT CLERK  
FILED M.

10:05

MAR 31 2022

PAULA WOODY,

Plaintiff,

vs.

LOWE'S HOME CENTERS, LLC —  
STORE # 1704,

Defendant.

DOCKET NO: CC-22-CV-24

HARRY JOHNSON

07 D.C.

COMPLAINT

The plaintiff, Paula Woody, brings this civil action against the defendant, Lowe's Home Centers, LLC, #1704 and for her cause of action would state as follows:

JURISDICTION AND VENUE

1. That plaintiff, Paula Woody, is a resident citizen of Troy, Obion County, Tennessee residing at 3700 West Shaw Town Road, 38260.

2. Upon information and belief, Lowe's Home Centers, LLC, Store #1704, is a limited liability company licensed to do business in Tennessee and operates a store at 800 West Reelfoot Avenue in Union City, Obion County, Tennessee. Its principal office is located at 1000 Lowes Boulevard in Mooresville, North Carolina. It may be served with process through its registered agent for acceptance of service of process, Corporation Service Company, 2908 Poston Avenue, Nashville, Tennessee 37203.

3. All of the events and negligence complained of in this complaint occurred in the jurisdiction of Obion County, Tennessee and within one year proceeding of the filing of this complaint.

### **FACTS**

4. On October 27, 2021, Paula Woody went to Lowe's Store #1704 to return some items she had purchased previously.

5. Ms. Woody parked in front of the store in the fire lane, went in to retrieve assistance from a Lowe's employee and was returning to her vehicle when the incident occurred.

6. At that time and prior to her fall, the Lowe's associate that was going to help her retrieve the products from her vehicle was pushing a flat bed cart owned and maintained by Lowe's.

7. As they approached Ms. Woody's vehicle, the Lowe's associate pushing the flat bed cart rolled the cart into the back of Ms. Woody's feet causing her to fall and sustain the harms and losses for which she is suing this defendant.

8. The defendant Lowe's Store #1704 engaged in a pattern of conduct, had recurring incidents and/or had a general or continuing condition which created a danger for customers properly on their premises. The conduct of Lowe's and its employees was the direct and proximate cause of the harms and losses sustained by Ms. Woody for which she seeks compensation.

### **DEFENDANTS' ACTS OF NEGLIGENCE**

9. That the defendant, by and through their agents, servants and/or employees were negligent as follows:

- a. Negligently pushing the flat bed cart into the feet of Ms. Woody causing her to fall and sustain the injuries made the basis of this action.

**INJURIES AND DAMAGES**

10. As a direct and proximate result of the negligence of the defendant, their agents, servants and/or employees, as specifically set forth in this complaint. The following injuries and damages have been incurred by the plaintiff Paula Woody:

- a. Past, present and future pain and suffering.
- b. Past, present and future emotional and mental distress.
- c. The loss of the pleasures and enjoyments of life past, present and future.
- d. Permanent physical impairment.
- e. Past, present and future medical expenses.

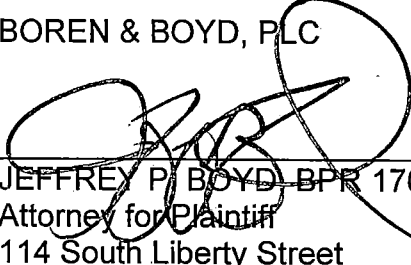
**RELIEF SOUGHT**

WHEREFORE, the plaintiff, Paula Woody, demands judgment against the defendant, in the sum of Five Hundred Thousand Dollars (\$500,000.00) and the cost of this cause.

Respectfully submitted,

BOREN & BOYD, PLC

BY:

  
\_\_\_\_\_  
JEFFREY P. BOYD BPR 17040  
Attorney for Plaintiff  
114 South Liberty Street  
Jackson, Tennessee 38301  
[jboyd@borenandboyd.com](mailto:jboyd@borenandboyd.com)  
(731) 423-3300

**COST BOND**

The plaintiff hereby acknowledges that they are sureties for the cost of this cause not to exceed One Thousand and no/100ths (\$1,000.00) dollars

  
\_\_\_\_\_  
JEFFREY P. BOYD